

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

IN THE MATTER OF THE SEARCH OF  
THE CELLULAR TELEPHONE NUMBER  
PARTICULARLY DESCRIBED IN  
ATTACHMENT A OF THE AFFIDAVIT  
OF DHS HSI SPECIAL AGENT MICHAEL  
HILL DATED AUGUST 19, 2024

Case No. 2:24-cr-696

**MOTION TO SEAL**

The United States of America, by and through its undersigned Assistant United States Attorney, hereby moves this Court to seal the affidavit in support of the search warrant and the attachments thereto, as well as the return to the warrant identifying any evidence seized. The Court has the inherent authority to seal these documents. *See Baltimore Sun v. Goetz*, 886 F. 2d 60 (4th Cir. 1988). The purpose of the Government's request is to protect the information contained within these documents and to avoid the disclosure of the investigation at this time.

Based on the facts in the affidavit, there is reason to believe that disclosure of the information in these documents would seriously jeopardize the investigation including by giving targets the opportunity to destroy or tamper with evidence, change patterns of behavior, flee from prosecution, intimidate cooperating and potential witnesses, and endanger the safety of law enforcement and other individuals. For these reasons, the Government submits that the interests in sealing the affidavit and attachments thereto and the return and non-disclosure documents outweigh the common-law public right of access and that sealing is "essential to preserve higher values." *See Media Gen. Operations, Inc. v. Buchanan*, 417 F.3d 424, 429–31 (4th Cir. 2005). The Government further submits that by providing public access to the application, search warrant, motion to seal and the sealing order, the denial of access is narrowly tailored to serve the Government's interests in sealing. *Id.* at 429.

Based on the foregoing, the Government requests that the affidavit in support of the search warrant and attachments thereto, as well as the return to the warrant identifying any evidence seized, be filed under seal except that working copies should be made available to the United States Attorney's Office, the Department of Homeland Security, Homeland Security Investigations, and any other law enforcement agency designated by the United States Attorney's Office.

Respectfully submitted,

ADAIR F. BOROUGH  
UNITED STATES ATTORNEY

/s/ W. Cole Shannon  
W. COLE SHANNON, #13240  
Assistant United States Attorney  
151 Meeting Street, Suite 200  
Charleston, South Carolina 29401  
(843) 727-4381

August 19, 2024